

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EIMONT BRONZINI

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED #: 9-26-12 e

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

- against -

CLASSIC SECURITY LLC

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

11 Civ. 2096 (KBF)

NOTICE OF MOTION

TO COMPEL
DISCOVERY

PLEASE TAKE NOTICE that upon the annexed affirmation of EIMONT BRONZINI
affirmed on SEPTEMBER 26, 2012, and upon the exhibits attached thereto (delete if no
(date) exhibits), the accompanying Memorandum of Law in support of this motion (delete if there is no
Memorandum of Law), and the pleadings herein, plaintiff/defendant will move this Court, before
KATHERINE B. FORREST, United States ~~District~~ Magistrate Judge, for an order
(Judge's name) (circle one)
pursuant to Rule 37 of the Federal Rules of Civil Procedure granting (state what you want the
Judge to order): MOTION TO COMPEL DISCOVERY ASKING JUDGE TO ORDER
DEFENDANT TO MAKE TO PRODUCE REQUIRED DOCUMENTS, WHICH WERE
REQUESTED BY PLAINTIFF, BUT WERE REFUSED TO PRODUCE BY DEFENDANT
AFFIDAVIT OF SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DISCOVERY ATTACHED

I declare under penalty of perjury that the foregoing is true and correct.

ON 5 PAGES

Dated: BROOKLYN, NY
(city) SEPTEMBER 26, 2012 (state)
(month) (day) (year)

Signature E. Bronzini
Address 2251 81 STREET APT C-1
BROOKLYN, NY 11214
Telephone Number 718-490-3741
Fax Number (if you have one) _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

EIMONT BRONZINI, : Civil Action No. **11 Civ. 2096 (KBF)**

Plaintiff, :
- v - :
 :
CLASSIC SECURITY, LLC, :
 Defendant. :
----- X

**AFFIDAVIT OF EIMONT BRONZINI IN SUPPORT OF PLAINTIFF'S MOTION
TO COMPEL DISCOVERY**

1. I am Plaintiff, Eimont Bronzini and I make these written statements with personal knowledge that what is written , signed under penalty or perjury.
2. Defendant disagreed to provide initial disclosures and to produce most of required documents even when he was asked in good faith by Plaintiff for the second time to do it on September 18,2012 during day of Plaintiff's depositions .
3. Plaintiff under Rule 37 (a) (2) filed Motion to Compel Discovery asking Judge to order Defendant to make initial disclosures, to make , to produce required documents, which were requested by Plaintiff , but were refused to produce by Defendant.

**DOCUMENT REQUESTS UNDER RULE 37 A MOTION TO COMPEL
DISCOVERY**

Document Request No. 1

Produce exact documents identified by Defendant in his responses to the interrogatories above or which support in any way Defendant's responses to the interrogatories.

Document Request No. 2

Produce from date of November 3rd, 2010 year through February 11th, 2011 year from *Classic Security an Alliance Building Services Company Log Book* - ALL PAGES, ALL SHIFTS, ALL ENTRIES - from 80 Broad St. site.

Document Request No. 3 – Defendant produced

Produce 2010/ 2011 year's *Classic Security an Alliance Building Services Company Post Orders* - ALL PAGES - from 80 Broad St. site.

Document Request No. 4

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including Classic's confidential E-mails, related to firing/terminating from Classic all of 10 witnesses officially provided in 2008 year's case #07 CV 11104 (HB) by Classic Security LLC to testify against plaintiffs Eimont Bronzini and Lolita Bronzini

Document Request No. 5 -Defendant produced some of them

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including Classic's confidential E-mails, related to February 11th, 2011 FSD E.Bronzini's firing /terminating from Classic Security company with NO REASON.

Document Request No. 6

Produce all Classic Security an Alliance of Building Services Company's official E-mails / correspondences, including confidential E-mails, issued after February 11th, 2011 from Union's *Grievance Hearing Procedure*, related to February 11th, 2011 FSD E.Bronzini's firing /terminating from Classic Security company with official NO REASON.

Document Request No. 7

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including confidential E-mails about Security Officer's, who worked in 2010/2011 year at 80 Broad st. site (name known by Classic) related to his firing/terminating from Classic for his pissing into the bucket, because basement's toilet was intentionally locked by building engineers, who changed public (employee's) toilet into private restroom/club. Alliance of Building Services Classic Security's office official E-mails / correspondences, including confidential E-mails about

Document Request No. 8

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including confidential E-mails, reprimands/write-ups issued about or for FSD Pier Luis who worked at 80 Broad st. site in 2010/2011 years and was fired/terminated from Classic ,because he was caught outside building (abandoned post), when he was looking for toilet in life emergency, because basement's toilet was intentionally locked by building engineers, who changed public (employee's) toilet into private restroom/club.

Document Request No. 9 - partially provided by Defendant

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including confidential E-mails, reprimands/write-ups issued about or for FSD Brian Watson, his all on-site tests dates, FDNY summons , documents related to paid by Classic monetary fines for violation of FDNY rules by FSD B.Watson, who in April of 2008 year abandoned/left 320 E 53 st. site/post- 11 stories residential building .

Document Request No. 10

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including Classic's confidential E-mails related to On-site test scheduled for January 18th, 2011 for uninformed FSD E.Bronzini at 711 3rd Ave. site.

Document Request No. 11

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including all her on-site test dates, all FSD written tests dates at FDNY, Classic's confidential E-mails related to FSD Kimberly Danza ,who worked in 2010/2011 year at 80 Broad st. site.

Document Request No. 12

Produce all Classic Security an Alliance of Building Services Company's office official E-mails / correspondences, including all her on-site test dates, all FSD written tests dates at FDNY, Classic's confidential E-mails related to FSD Agnes Foster ,who worked in 2010/2011 year at 80 Broad st. site.

4. Additional request for produce of documents under Rule 37 in Motion to Compel Discovery is because Defendant refused to answer or intentionally lied to interrogatories and refused to produce required documents :

Document Request No. 13 - Interrogatory No. 21

Identify how many (exact amount) Classic's FSDs did African-American Classic's Director of Operations R. Jessamy gave opportunities to take first their FDNY On-Site Tests in 2008 year; in 2009 year; in 2010 year; in 2011 year - identifying their national origin and Race?

Document Request No. 14 -Interrogatory No. 22

Identify how many (exact amount) did African-American Classic's Director of Operations R. Jessamy hired new FSDs in 2008 year; in 2009 year; in 2010 year; in 2011 year - identifying their national origin and Race – for always available FSD work positions in Classic with starting \$15+ per hour pay rate?

Document Request No. 15 -Interrogatory No. 23

Identify how many (exact amount) African-American Classic's Director of Operations R. Jessamy hired new Security Officers S/Os in 2008 year; 2009 year; 2010 year; 2011 year - identifying their national origin and Race – for always available S/O work positions in Classic?

Document Request No. 16 -Interrogatory No. 25

Identify how many African-American Classic's Director of Operations R.Jessamy fired/terminated from Classic – with NO REASON during 2009, 2010, 2011 years – starting with FSD E. Bronzini, FSD Pier Luis, and Security Officer (name known/and hidden by Classic) – with the same “Classic's Stinky Method” instead of giving them a key to the 80 Broad St. site's basement's toilet, R.Jessamy together with intentionally cooperative perverse/corrupted 80 Broad St. site's Engineers, who locked basement's toilet, (making toilet into their personal club/restroom) – putting the whole 36 (thirty six) stories Building's tenants into danger, because of the natural/human FSD's emergency need to look for the toilet outside the building premises?

I, Eimont Bronzini, Plaintiff declare under penalty of perjury that the foregoing is true and correct.

Dated: Brooklyn, New York

September 26th, 2012

By: *E. Bronzini*

Eimont Bronzini, *Plaintiff*

2251 81st Street, Apt C-1
Brooklyn, NY 11214
(718) 490 3741

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EIMONT BRONZINI

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

11 Civ. 2096 KBF

- against -

CLASSIC SECURITY LLC

AFFIRMATION OF SERVICE

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

I, EIMONT BRONZINI

(name)

, declare under penalty of perjury that I have

served a copy of the attached NOTICE OF MOTION TO COMPEL DISCOVERY WITH AFFIDAVIT OF SUPPORT
(document you are serving)

upon CLASSIC SECURITY (ANDREW W. SINGER)
(name of person served) whose address is ANDREW W. SINGER

TANNENBAUM HELPERN SPRACHSE & HIRSHTITT LLP.
(where you served document)

900 THIRD AVENUE, NEW YORK
NY10022

by MML

(how you served document: For example - personal delivery, mail, overnight express, etc.)

Dated: BROOKLYN, NY
(town/city) (state)

SEPTEMBER 26, 2012
(month) (day) (year)

E. Bronzini
Signature

2251 81ST STREET APT C-1
Address

BROOKLYN, NY
City, State

11214
Zip Code

718-490-3741
Telephone Number